

Richard Nikolaus Renz Tactical Defense Solutions LLC 129 Riverview Avenue Portsmouth, VA 23704 JUL 1 0 2018

RE: M

MURs 7078 and 7084

Dear Mr. Renz:

On June 15, 2016, the Federal Election Commission (the "Commission") notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. On June 28, 2018, the Commission found that there is no reason to believe you violated 52 U.S.C. § 30119(a)(1). Accordingly, the Commission closed its file in this matter.

Documents related to the case will be placed on the public record within 30 days. See Disclosure of Certain Documents in Enforcement and Other Matters, 81 Fed. Reg. 50,702 (Aug. 2, 2016). The Factual and Legal Analysis, which explains the Commission's finding, is enclosed for your information.

If you have any questions, please contact me at (202) 694-1650.

Sincerely,

Mark Shonkwiler

Assistant General Counsel

Enclosure

Factual and Legal Analysis

FEDERAL ELECTION COMMISSION

1	FACTUAL AND LEGAL ANALYSIS		
2	RESPONDENTS:	Stephen Baggs	MUR: 7084
4	RESPONDENTS.	Systems Technology Forum, Ltd.	WOR. 7084
5		Thomas Bates	
6		RK Chevrolet, Buick, Subaru, Inc.	
7		Darek Dabbs	
8		Sera-Brynn LLC	
9		Eric Kimble	
10		Kimble Companies/Penn-Ohio Coal C	Co.
11		Ronald Kramer	
12		Kramer Management Enterprises, Inc.	
13		Shawn Kuhle	
14		Turner Strategic Technologies	
15		Tactical Defense Solutions LLC	
16		William W. Lee, Jr.	
17		National Research Group, LLC	
18		Bob Miller	
19		Miller-Stephenson & Associates, P.C.	•
20		David H. Mutzabaugh	
21		ThunderCat Technology, LLC	
22		Richard D. Roberts	
23		Norfolk Southern Corporation	
24		Eric Sisco	
25		Virginia International Gateway, Inc.	
26			•
27	I. INTRODUC	CTION	
28	ent !		
29	This matter	was generated by a Complaint filed with	the Federal Election Commission by
30	Lisa Clarkson. The Complaint alleges multiple federal contractors violated the Federal Election		
31	Campaign Act of 1971, as amended (the "Act") and Commission regulations, by contributing to		
32	Scott Taylor for Con	ngress (the "Committee"). For the reaso	ns set forth below, the Commission
33	finds no reason to believe that the alleged federal contractors violated the Act or regulations		

MUR 7084 (Alleged Federal Contractors) Factual and Legal Analysis Page 2 of 2

II. FACTUAL AND LEGAL ANALYSIS

- 2 Scott Taylor was a Member of the Virginia House of Delegates, and ran for Congress in
- 3 Virginia's Second District in 2010 and 2016. The Complaint alleges multiple federal
- 4 contractors contributed to Taylor's congressional committee.²
- 5 Federal contractors may not make contributions to political committees, and a Committee
- 6 may not knowingly solicit donations from federal contractors.³ This prohibition does not apply
- 7 to individual employees of a federal contractor who are not themselves contractors. Employees
- 8 of federal contractors may contribute to federal political committees using personal funds.⁵
- 9 The Committee alleges that the contributors identified by the Complaint are employees of
- 10 federal contractors, not contractors themselves, and may contribute. Nearly all of the named
- contributors submitted responses affirming that they are not contractors, and that the funds used
- 12 were personal and not directed by a contractor firm. One contributor did not respond, but the
- 13 Commission has no information indicating that he is a federal contractor. The Commission
- 14 therefore finds no reason to believe that the individuals named in the Complaint are federal
- contractors, and no reason to believe that they violated 52 U.S.C. § 30119(a)(1).

Taylor lost the Republican Primary in 2010, and won election to Congress in 2016.

² Compl. at II (June 14, 2016).

³ 52 U.S.C. § 30119(a)(1)-(2); 11 C.F.R. § 115.2.

⁴ 11 C.F.R. § 115.6.

Id. Additionally, if a sole proprietorship is a federal contractor, the owner of that entity may not donate to federal campaigns using business, personal or other funds. Id. § 115.5.